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VIA ELECTRONIC FILING

June 21, 2011

Hon. Lawrence E. Kahn
Senior U. S. District Court Judge
U.S. District Court, Northern District of New York
445 Broadway, Room 424
James T. Foley U.S. Courthouse
Albany, New York 12207

RE: *Seekamp v. Fuccillo Lincoln Mercury Hyundai, Inc.*
Civil Case No. 1:09-cv-00018-LEK-DRH
U.S. District Court, Northern District of New York

Your Honor:

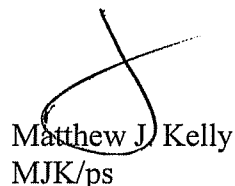
Plaintiff filed a motion for class certification on February 3, 2011. We filed opposition to that motion as well as a cross-motion for summary judgment on March 1, 2011. The plaintiff's time to reply was extended to April 4, 2011 and she filed her reply on April 5th.

On June 21, 2011 plaintiff has filed amendments to its original filing without requesting consent of this party or seeking leave of the court.

We request that the court disregard and strike the filing of the plaintiff at this late date. To allow plaintiff to supply information that did not exist at the time of our cross-motion for summary judgment would, of course, be unfair to the defendant and require us to request an opportunity to file supplementation to our original cross-motion. We request that if the court is going to allow the filing to stand, that we be provided with opportunity to file our response to their contentions.

Very truly yours,

Roemer Wallens Gold & Mineaux LLP


Matthew J. Kelly
MJK/ps

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Page 2 of 2

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